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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8  
9 THE UNITED STATES OF AMERICA

Case No.: 2:13-cr-00147-LDG-GWF

10 Plaintiff,

**UNOPPOSED MOTION TO TRAVEL  
OUT OF CENTRAL DISTRICT OF  
CALIFORNIA; PROPOSED ORDER**

11 vs.

12 JACLYN MIKIE SUMARNKANT

13 Defendants.

14  
15 COMES NOW, Defendant Jaclyn Mikie Sumarnkant, by and through her counsel, Erick  
16 M. Ferran, Esq., and moves the Court for an Order allowing Defendant Sumarnkant to travel from  
17 her residence to outside of the Central District of California for the purpose of attending a wedding  
18 from September 6<sup>th</sup>, 2013, until September 10<sup>th</sup>, 2013. In support of the instant unopposed motion,  
19 Defendant states the following:

20  
21 Suggestions in Support:

- 22  
23 1. On September 3, 2013, counsel for Defendant Sumarnkant contacted Assistant  
24 United States Attorney Amber Craig, Esq., in regards to this request. Ms. Craig  
25 stated that she did not have an objection to the request as long as it was acceptable  
26 to pre-trial services.

2. Ms. Sumarnkant is currently on a travel restriction which restricts her to staying within the District of Nevada and/or the Central District of California, and which only allows travel for "Court Purposes."
  3. Ms. Sumarnkant is currently under the supervision of Kristianna Janich, a Pretrial Officer in California. She is similarly being supervised in Las Vegas by Pretrial Officer Zach Bowen.
  4. Ms. Sumarnkant has done extremely well on pretrial release, has abided by all conditions, and has never tested positive or violated any of the conditions of her release.
  5. Ms. Sumarnkant has been advised that her pretrial officer has no objection if the United States attorney and the Court approve.
  6. The travel request is made so that Ms. Sumarnkant can attend her sister-in-laws wedding from September 6<sup>th</sup> through the 10<sup>th</sup>, in San Diego, California. As such, the request is made so that she may travel not out of the state, but out of the Central District into the Southern District of California. Ms. Sumarnkant will be a member of the bride's party and hopes, with the Court's approval, to be allowed to participate in her obligations as one of the bridesmaids.
  7. Ms. Sumarnkant would depart from her residence in California on September 6, 2013, and drive directly to the wedding, which would be in San Diego, California. There, she would be in the presence of family members and would stay in the San Diego area until the wedding concluded on September 10<sup>th</sup>, 2013, wherein she would immediately return to her home.
  8. Ms. Sumarnkant would naturally comply with any further restrictions required by Pretrial during the time of her travel.

9. To date, Ms. Sumarnkant has been a model client. She has remained in constant contact with the undersigned counsel and there is no indication that Ms. Sumarnkant has been dishonest about this trip or about any other issue regarding this case. Ms. Sumarnkant has been fully compliant with pretrial services, and is only requesting the opportunity to travel within the State of California (but outside of the Central District). The undersigned represents to this Court that Ms. Sumarnkant does not appear to be even the slightest flight risk.

WHEREFORE Defendant Sumarnkant respectfully requests leave of this court to depart her residence in the Central District of California on September 6, 2013, to travel to San Diego, California, returning on September 10<sup>th</sup>, 2013, for the purposes of attending her sister-in-law's wedding.

/s/ Erick M. Ferran, Esq.  
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*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of HITZKE & ASSOCIATES and that on the 3<sup>rd</sup> day of September, 2013, I caused to be sent via ECF filing, a true and correct copy of the above and foregoing **UNOPPOSED MOTION TO TRAVEL OUT OF CENTRAL DISTRICT OF CALIFORNIA; PROPOSED ORDER** properly addressed to the following:

Amber Craig, Esq.  
Assistant United States Attorney

/s/ Erick M. Ferran  
An Employee of Hitzke & Associates

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

## THE UNITED STATES OF AMERICA

Case No.: 2:13-cr-00147-LDG-GWF

Plaintiff,

**[PROPOSED] ORDER ALLOWING  
TRAVEL**

vs.

JACLYN MIKIE SUMARNKANT

### Defendants.

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11       Based upon the Motion of Defendant, and good cause appearing therefore, IT IS HEREBY  
12 ORDERED that the Defendant, JACLYN MIKIE SUMARNKANT, be allowed to travel as  
13 requested. Specifically, Defendant is hereby permitted to travel from her residence in the Central  
14 District of California, to San Diego, California, on September 6, 2013. She is permitted to remain  
15 in San Diego, California, until September 10<sup>th</sup>, 2013, whereupon she is to return to her home in the  
16 Central District of California. During this time the Defendant will continue to comply with  
17 pretrial services, and will comply with any additional restrictions imposed during her period of  
18 travel.  
19

Dated this 5 day of September, 2013.

*George Foley Jr.*  
GEORGE FOLEY, JR.  
United States Magistrate Judge